



City of Galveston

Grants & Housing Department

2508 Ball Avenue / Galveston, TX 77550
(409) 797-3820 / Fax (409) 291-4553

April 30, 2020

To: Brian Maxwell, City Manager
Hon. Mayor and City Council Members

From: Alice T. Law, Interim Director of Grants & Housing

RE: Conduct a Public Hearing and Consider for Approval the 2020 Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Consolidated Program Objectives and Projects in the total amount of \$1,490,525 (CDBG Allocation of \$1,214,844 and HOME Allocation of \$275,681) and CDBG and HOME Program Income total estimates of \$60,000 and Amendments to the Citizen Participation Plan. Authorize the City Manager to file a grant application with the U.S. Department of Housing and Urban Development (HUD) and execute all necessary contracts, certifications, and documents for the Programs.

I. Background

- A. The Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs are administered by the U.S. Department of Housing and Urban Development (HUD) under a multi-year Consolidated Plan.
 - 1. The primary purpose of the CDBG Program is to develop, enhance, and preserve urban communities through the provision of funds to provide investments to alleviate physical and economic deterioration, expand housing opportunities, and provide services to the public.
 - 2. The HOME Program's purpose is to increase the supply and availability of affordable housing to low-income and very low-income families through homeownership, residential rehabilitation assistance and Community Housing Development Organizations.
- B. All activities or projects funded under the CDBG Program must meet one (1) of three (3) national objectives:
 - 1. Benefit low- and moderate-income persons;
 - 2. Aid in the prevention or elimination of slum or blight; or,
 - 3. Meet an urgent community development need, as defined by HUD.
- C. All projects funded under the HOME Program must facilitate housing activities for low and moderate-income households.



- D. HUD has issued the 2020 Allocations for Entitlement Cities. The City will receive \$1,214,844 in CDBG funding and \$275,681 in HOME funding. The 2020 Allocations are an increase from the City's 2019 funding in the following amounts: CDBG +\$15,551 (+1.3%) and HOME +\$17,231 (+6.67%).
- E. On March 24, 2020, staff presented and discussed the 2020 CDBG and HOME Program proposed projects and objectives.
- F. The City is required by HUD to have a Citizen Participation Plan that details the community's procedures for involving the public in its program planning and implementation. Due to the coronavirus 19 (COVID-19) pandemic, the CARES Act and HUD have granted certain waivers that allow changes in the citizen participation process requiring the City to amend its Citizen Participation Plan. HUD requires the adoption of any amendments to the Plan by the City's governing body.

II. Current Situation

- A. As required by HUD, staff developed a list of Community Development and Housing Objectives for the 2020 Proposed Projects to meet the City's identified Consolidated Plan High Priority Needs and a recommended list of eligible projects for City Council's consideration of funding. (**Attachment A**)
- B. Since the March 24, 2020 discussions of the 2020 proposed projects, HUD has released two (2) sets of statutory and regulatory waivers to the HOME Investment Partnerships (HOME) Program and HOME Tenant-Based Rental Assistance (TBRA) to enable Cities to more quickly use their HOME funds to respond to the housing needs of those impacted by the COVID-19 pandemic.
- C. Based on the waivers, staff has amended our 2020 HOME Programs Proposed Projects for the Tenant-Based Rental Assistance Program, the Community Housing Development Org. (CHDO) project, and the HOME Administration as follows:
 - 1. TBRA Program – waivers allowed for short-term assistance for new and existing rental leases including short-term rental and allows 100% of utilities; added short-term assistance and utility deposits and payments
 - 2. CHDO Project – waivers reduced set-aside requirement from 15% to 0%; used funds for TBRA program for short-term assistance
 - 3. HOME Administration – waivers allowed for an increase of administration costs from 10% to 25%; increased the admin to 25%
- D. The City has amended its Citizen Participation Plan to provide for the waivers from the CARES Act and HUD and some cleanup edits as follows (**Attachment B with amendments in bold**):
 - 1. Added Section VI. Contingency Plan in the Event of an Emergency/Disaster and included the specific 5-day notice and comment period and allowance of virtual public hearings
 - 2. Added cleanup edits (as bolded throughout the document) to update the postings on the City's Website and social media
- E. Staff will complete the citizen comment period for the 2020 CDBG and HOME Programs and Citizen Participation Plan Amendment on April 29, 2020. Any comments received will be presented during the public hearing.

III. Issues

- A. National Objectives and Purpose – Each CDBG activity meets one (1) of three (3) national objectives of the CDBG Program as previously described. Each HOME activity is designed for the purpose of providing housing activities to the LMI.
- B. Budget – The CDBG and HOME Program budget is consistent with the HUD allocation amount for the City.
- C. Equity and Citizen Participation – In keeping with HUD’s consolidated bottom-up planning process to ensure the involvement of residents most affected by the 2020 CDBG and HOME Programs, the City notices ran in the local newspaper and were posted on the City’s webpage.
 - 1. A Public Hearing on the 2020 CDBG and HOME Programs will be conducted on April 30, 2020 in coordination with the City Council meeting. Citizens were also allowed to provide comments until April 28th.
 - 2. City staff published in the Galveston County Daily News the 2020 CDBG and HOME Program proposed projects and the Community Development and Housing Objectives list and posted online with public notices published online and through social media for the Citizen Comment Period.
- D. Consistency with HUD Consolidated Plan – All activities or projects funded under the CDBG and HOME Programs are in compliance with the City’s Consolidated Plan in meeting the identified community development and housing needs and priorities.
- E. Consistency with Comprehensive Plan – The enhancement of housing and neighborhoods and the provisions of public services, code enforcement and public facilities and improvements are key elements in the Comprehensive Plan.
- F. Impact or Ramifications – Failure to approve the 2020 CDBG and HOME Programs Projects and Community Development & Housing Objectives could result in the City not meeting a timely submission of the 2020 Annual Action Plan, delaying the program year.

IV. Recommendation

- 1. Approve the 2020 CDBG and HOME Programs Community Development & Housing Objectives and Projects in the total amount of \$1,490,525 (CDBG Allocation of \$1,214,844 and HOME Allocation of \$275,681) and the CDBG and HOME Program Income total estimates of \$60,000. Authorize the City Manager to file a grant application with the U.S. Department of Housing and Urban Development and execute all necessary contracts, certifications, and documents for the 2018 CDBG and HOME Programs.

V. Fiscal Impact Report

Requested by:	Alice T. Law, Interim Director of Grants & Housing
Funding Source:	U.S. Dept. of Housing & Urban Development (HUD) 2018 Community Development Block Grant and HOME Investment Partnership Programs
Costs of implementation:	Total \$1,490,525

Estimated annual M&O costs: N/A

Estimated cumulative M&O costs: N/A

Additional Information: N/A

Respectfully Submitted,

Approved,



Alice T. Law
Interim Director of Grants & Housing

Brian Maxwell
City Manager

Attachment A

CITY OF GALVESTON
2020 CDBG and HOME Programs Recommendations DRAFT

The U.S. Dept. of Housing & Urban Development (HUD) administers the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs and has released the 2020 CDBG and HOME Funding Allocations. The City will receive CDBG funding in the amount of \$1,214,844 and HOME funding in the amount of \$275,681. The 2020 Allocations are an increase from the City's 2019 funding in the following amounts: CDBG +\$15,551 (+1.3%) and HOME +\$17,231 (+6.67%). CDBG and HOME Program Income has been estimated at a total of \$50,000 (CDBG \$20,000 and HOME \$30,000).

2020 Community Development & Housing Objectives PROPOSED

The following objectives were identified in the City's 2019 Consolidated Plan to meet the documented High Priority Needs.

1. To provide and expand homeownership opportunities for LMI homebuyers;
2. To provide and expand access to affordable housing through rental subsidies for LMI households and assisting in the prevention of homelessness;
3. To provide housing services to support LMI homeownership, TBRA, and other housing activities;
4. To educate and enforce lead-based paint and other lead hazards rules and regulations;
5. To identify and eliminate barriers to affordable housing and impediments to fair housing;
6. Provide code enforcement and neighborhood revitalization activities to diminish unsafe buildings and lots, blighting influences, and general neighborhood decay in LMI areas;
7. Provide infrastructure enhancement to support neighborhood revitalization and residential development in LMI areas;
8. Promote the health and well-being of city LMI residents through the provision of public and supportive services including youth programs;
9. Provide mechanisms to reduce crime and enhance public safety in LMI areas;
10. To facilitate neighborhood, comprehensive, and individual project management, planning, and capacity building activities for LMI areas;
11. Provide economic development opportunities and Section 3 education for LMI persons and businesses; and
12. Assist in the coordination of homeless resources in the community through participation with and reliance on the Continuum of Care Program.

2020 CDBG Program Projects PROPOSED

Project	Description	Outcomes	2020 Proposed Funding
Public Service Activities			(Requirement Limit of 15% Cap - \$182,226) \$ 182,226.00
Parks & Recreation Dept. Children & Youth Program	Provide staffing to implement summer and after-school supervised educational / recreational activities at Menard and Wright Cuney Parks and Recreation Centers for primarily LMI (90%) children and youth ages 5-17	900 children and youth	\$ 153,226.00
Police Dept. Crime Prevention Program	Provide officers for extra-duty patrols and equipment to reduce the levels of criminal activity and assist residents in low-moderate income neighborhoods; work with citizens and neighborhood groups to identify and report criminal activity	900 citizen contacts	\$ 29,000.00
Public Facility & Improvement Activities			\$ 541,574.00
Public Works Dept. Streets Repaving	Provide street improvements in LMI areas to repave existing deteriorated streets using City staff to enhance other street paving efforts in the residential areas and make safer neighborhood thoroughfares	15 blocks of improvements	\$ 541,574.00
Code Enforcement Activities			\$ 197,947.00
City Marshall-Compliance Division Code Compliance Officers	Provide 4 compliance officers to work in LMI and deteriorated neighborhoods to conduct property inspections and reinspections to enforce local codes and owner notifications and processes for enforcement on non-compliant properties	4,000 inspections and 900 reinspections	\$ 197,947.00

Project	Description	Outcomes	2020 Proposed Funding
Affordable Housing Activities			\$ 50,129.00
Affordable Housing Services	Provide management and oversight for the affordable housing programs including tenant-based rental assistance, homebuyer, and other housing related issues including projects funded through the CDBG and HOME Programs	Ensure regulatory compliance	\$ 50,129.00
Planning & Program Administration Activities			(Requirement Limit of 20% Cap - \$242,968) \$ 242,968.00
CDBG Program Administration	Provide management of the CDBG and HOME Programs to ensure compliance with all regulatory requirements	Ensure regulatory compliance	\$ 242,968.00
CDBG TOTAL ALLOCATION			\$ 1,214,844.00

CDBG Program Income (Estimated)	Provide Consolidated Plan Eligible Projects such as code enforcement and affordable housing services from PI received primarily from housing rehabilitation loan payments and payoffs and lot clearance, boardup, and demolition lien payoffs	Assist in eligible CDBG projects	\$ 20,000.00
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2020 HOME Program Projects PROPOSED

Project	Description	Outcomes	2020 Proposed Funding
Affordable Housing Activities			\$ 206,761.00
Grants & Housing Dept. Tenant-Based Rental Program (from CHDO Set-Aside)	Due to HUD COVID-19 HOME Waiver, City has use of the Community Housing Development Org. (CHDO) funding to use for other affordable housing projects to assist families affected by the pandemic. Provide Tenant-Based Rental Assistance (TBRA) for rental subsidies to assist LMI households with affordable housing costs including rent payments, security deposits, utility deposits and utilities for short-term assistance; HUD COVID-19 HOME Waiver reduced CHDO Requirement for 15% Set-aside to 0%; short-term rental assistance available through 12-31-20	3 LMI households	\$ 41,353.00
Grants & Housing Dept. Tenant-Based Rental Program	Provide Tenant-Based Rental Assistance (TBRA) for rental subsidies to assist LMI households with affordable housing costs including rent payments, security deposits, utility deposits, and utilities for long-term and short-term assistance (short-term for COVID-19 related assistance available through 12-31-20)	12 LMI households	\$ 165,408.00
HOME Program Administration Activities			(Requirement Limit increased from 10% to 25% Cap - \$68,920) \$ 68,920.00
HOME Program Administration	Provide management of the HOME Program to ensure compliance with all regulatory requirements; HUD COVID-19 HOME Waiver increased Cap Limit to 25%	Ensure regulatory compliance	\$ 68,920.00
HOME TOTAL ALLOCATION			\$ 275,681.00

HOME Program Income (Estimated)	Provide Consolidated Plan Eligible Projects such as TBRA and homeownership projects from PI received primarily from homebuyer and housing rehabilitation loan payments	Assist in eligible HOME projects	\$ 30,000.00
TOTAL CONSOLIDATED PROGRAMS			\$ 1,490,525.00

Attachment B

CITY OF GALVESTON

CITIZEN PARTICIPATION PLAN

I. Introduction

The involvement of citizens is vital to the development of sound and stable communities. The City of Galveston, TX wishes to ensure that citizens have an opportunity to participate in the planning, implementation, and assessment of the Consolidated Plan, substantial amendments thereto, and the annual performance reports. While the regulations that govern this plan clearly state that elected officials have statutory responsibilities for the administration of the CDBG and HOME programs, participation by local residents is very important to ensure that the elected officials' decisions are made with an awareness of citizen perceptions and needs.

II. Purpose of Citizen Participation Plan

The City is required to adopt a citizen participation plan that sets forth the City's policies and procedures for participation in the planning process of the Consolidated Plan (which includes the 5-year plan and the 1-year action plans), substantial amendments thereto, and in the annual performance reports the City has to submit to HUD. The regulations, codified at 24 CFR Part 91, require that the City, prior to submission of the Consolidated Plan, has prepared and followed a written citizen participation plan, set out herein, that provides an opportunity for citizens to participate in the development of the citizen participation plan itself, the Consolidated Plan, substantial amendments thereto, and the annual Performance Report. The City is required to encourage the views and the submission of proposals by low and low/moderate income persons, particularly those living in slum and blighted areas where CDBG and HOME funds are proposed to be used; and by residents of predominantly low and moderate income neighborhoods, as defined by the neighborhoods where 51% or more of the households income is 80% or below the area median income. The City must also actively solicit the participation of residents of public and assisted housing. The City has to take whatever actions are appropriate to encourage all of its citizens, including non-English speaking persons, as well as persons with disabilities, to be involved in the planning process.

It is the goal of the Citizen Participation Plan to outline the process by which the City of Galveston's residents may articulate their community development needs and express their feelings, assessments, and preferences about the implementation of the Community Development Block Grant (CDBG) and HOME Programs. The plan creates a citizen participation structure that affords citizens the opportunity to participate in the development of the Consolidated Plan by assisting the City in selecting program priorities and to review the various application components before they are finalized by City Council action.

III. Citizen Participation Process

The City of Galveston will provide the citizens of Galveston with every opportunity possible to participate in its annual Consolidated Plan planning process, any substantial amendments thereto, and in the development of the Performance Report.

The City of Galveston certifies that it will, before it adopts the *Consolidated Plan*:

- make available to citizens, public agencies and other interested parties information that includes the amount of Consolidated Plan funds available, the range of activities to be undertaken, and the estimated amount that will benefit low and low/moderate income persons.
- make every effort to minimize displacement, and will make assistance available to persons that are displaced as a result of activities funded wholly or partially with CDBG or HOME funds, as set in the City's Displacement Policy. A copy of this policy is available during regular business hours (Monday-Friday 8am to 5pm) at the Grants and Housing Department. Additional copies will be made upon request.
- publish its proposed Consolidated Plan community-wide, to include a description of activities in sufficient detail, including location, to allow citizens to determine the degree to which they may be affected. Citizens, public agencies and other interested parties will be provided a reasonable period, not less than thirty (30) days, to examine the contents of the document. Community-wide means that the City will publish summaries in the Galveston Daily News, **post on the City's Website**, and may post or distribute notices **on social media**, at the public library, community centers, public housing sites, and City Hall. The complete proposed Consolidated Plan, and free copies thereof, will be available at the Grants and Housing Department **and posted on the City's Website**. Upon request, the Grants and Housing Department will make the material available in a form accessible to persons with disabilities.
- provide at least two (2) public hearings to obtain citizen views and to respond to proposals and questions at all stages of the Consolidated Plan process. The hearings will be held at two (2) different stages of the program year. At least one (1) hearing will be held before the proposed Consolidated Plan is published for comment. The hearings shall be held after adequate notice, as set out below, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped. Accommodations will be made for non-English speaking residents, if so requested at least ten (10) days before the hearing. This requirement will be set out in the notice.

The hearings will address housing and community development needs, priority non-housing community development needs, development of proposed activities, and review of program performance.

The City will consider any comments or views of citizens, public agencies or other interested parties that are received in writing, or orally at the public hearings in preparing the final Consolidated Plan. A summary of comments and views accepted, and a summary of

comments and views not accepted and the reasons therefore, will be attached to the final Consolidated Plan.

Criteria for *substantial amendments* to the Consolidated Plan: The City will use the “25% rule” in determining when an amendment is necessary to the Consolidated Plan. Whenever the City elects not to carry out an activity that was previously described and approved by HUD; to change the purpose, scope, location or beneficiaries of an activity; or when the City proposes to add a new activity, an amendment must be submitted to HUD. If more than 25% of the activity changes from its original purpose, then the amendment is considered “substantial” and citizens will be afforded an opportunity to comment on such amendments. The City certifies that it will:

- publish the proposed amendment(s), to include a description of activity(s) in sufficient detail, including location, to allow citizens to determine the degree to which they may be affected. Citizens will be provided a reasonable period, not less than thirty (30) days, to comment on the amendment(s) before the amendment is implemented. The City will publish the proposed amendment through notices in the Galveston Daily News, **post on the City’s Website**, and may post or distribute notices **on social media and** at City Hall.
- The City will consider any comments or views of citizens that are received in writing, or orally in response to notices of consideration of a substantial amendment. A summary of comments and views accepted, and a summary of comments and views not accepted and the reasons therefore, will be attached to the amendment of the Consolidated Plan.

Performance Reports. The City certifies that it will:

- publish a summary of the proposed performance report. Citizens will be provided a reasonable period, not less than fifteen (15) days, to comment on the performance report before the report is submitted to HUD. The City will publish a summary in the Galveston Daily News, **post on the City’s Website**, and may post or distribute notices **on social media and** at City Hall.
- The City will consider any comments or views of citizens that are received in writing, or orally in response to publication of the summary of the performance Report. A summary of comments and views accepted, and a summary of comments and views not accepted and the reasons therefore, will be attached to the Performance Report.

IV. Elements of the Citizens Participation Process

Public Hearings. The City will hold at least two (2) Public Hearings annually during different stages in the development of the Consolidated Plan. The first hearing will be held before the Consolidated Plan is published, to allow for citizen input. The hearings will address housing and community development needs, and non-housing community development needs, development of proposed activities, and review of program performance. The summaries/notices will contain enough information to permit informed comment. The summaries/notices will also

state where the entire document will be available for review and where free copies may be obtained.

Adequate notice will be deemed to have been given if the summary of the Consolidated Plan or Action Plan, amendment, or performance Report are published in the Galveston Daily News **and/or posted on the City's Website**, at least fourteen (14) days before the date of the Public Hearings.

The times and locations of the Public Hearings will be convenient to the general public. The hearings will be held at City Hall, which is accessible to the disabled, and will be scheduled after the regular workday or included with City Council meetings. The City will take every effort to accommodate disabled with special needs other than physical accessibility, if so requested at least 10 days before the hearing. If the City schedules a public hearing at a site other than City Hall, the City will ensure that the site is accessible to the disabled. Upon request at least 10 days before the hearing, the City will accommodate the visually impaired by presenting the information in large print or provide the information orally.

If a significant number of non-English speaking residents are expected to participate, or upon special request provided to the City at least ten (10) days before the hearing, the Department will take every effort to accommodate such residents by presenting the information in the language requested, and/or by having a translator present at the hearing.

Access to Records. The City will provide citizens, public agencies, and other interested parties with access to information and records related to the City's Consolidated Plan and the City's use of assistance under any of the programs covered by the Consolidated Plan during the five (5) years preceding the date of the request. The information requested will be made available, wherever possible, within fifteen (15) working days of the day of the written request, in compliance with the City's Open Records Policy.

Technical Assistance. The Department will provide technical assistance to groups representative of persons of low- and moderate-income that request assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The assistance need not include the provision of funds to the groups.

Complaints. The City will respond to every written complaint it receives related to the Consolidated Plan, amendments, and performance reports. The City will, where practical, provide a substantive, written response within fifteen (15) working days from the date the complaint was received.

V. General Information

Comments related to the Consolidated Plan, amendments, and the annual Performance Reports may also be sent directly to:

Mr. Robert Beck
CPD Representative
U.S. Department of Housing and Urban Development

Houston Field Office
1301 Fannin, Suite 2200
Houston, Texas 77002
(713) 718-3119

Unless otherwise stated in the Notices, applications, performance reports, the Citizen Participation Plan, the Consolidated Plan, the Environmental Review record, or any documents and records pertaining to any of these are on file and available for public review at the office of the Grants and Housing Department, 2508 Ball Avenue, during normal business hours.

Workshops on specific issues (e.g. changes in program regulations) will be held on an as-needed basis, and with adequate notice. In addition, CDBG and HOME Program staff are available to provide additional assistance and guidance upon request. Please contact the Grants and Housing Department at 409-797-3820 to schedule an appointment.

VI. Contingency Plan in the Event of an Emergency/Disaster

Disaster/Emergency events that may require expedited substantial amendments. It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. Disasters/emergency events that may necessitate an expedited substantial amendment may include 1) Man-Made-disasters, 2) Natural disasters, 3) Terrorism, and 4) Infectious disease.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City may utilize CDBG or HOME funds to meet these needs with an altered public comment period as designated by HUD or other statute/regulation/waiver instead of a 30-day public comment period, which is otherwise required for substantial amendments. To the greatest extent possible, the City will utilize the same mediums for publishing and posting notices for the public comment period. If the Galveston County Daily News is not a viable option, the other sources will be utilized as appropriate to make every effort to comply with citizen participation requirements.

With respect to a declared disaster, the City may elect to use CDBG or HOME funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG or HOME eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: 1) Benefit to low- and moderate-income (LMI) persons; 2) Aid in the prevention of slums or blight; and 3) Meet a need having a particular urgency (referred to urgent need). The City may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any

one of the three national objectives. All eligible HOME activities, including those to address declared disasters or emergencies, must meet the purpose of expanding the supply of decent, safe, sanitary affordable housing for very low-income persons, with primary attention to rental housing for very low and low-income families. The City may carryout eligible HOME activities to meet needs resulting from declared disasters or emergencies under the general purposes.

Disaster/Emergency events that may require conducting virtual public hearings. It may be necessary for the City to conduct virtual public hearings due to the inability to hold in-person public hearings due to social distancing and/or limits for public gatherings for public health reasons. The City will provide reasonable notification under the same mediums for publishing and posting notices for the public as appropriate and access for citizens in accordance with the disaster/emergency or HUD provisions. The City will allow for the receipt of citizen comments and publicly present comments during the public hearings and will provide timely responses to citizen questions and issues and public access to all questions and responses.

April 30, 2020 Amendment for the coronavirus 19 (COVID-19) pandemic. For CDBG funding under PY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the City may provide a 5-day notice of a proposed amendment to the City's Consolidated/Action Plans and virtual public hearings beginning April 9, 2020 as allowed under a HUD waiver. For HOME funding under PY 2019-2020, CHDO funding under PY 2017-2020, and FY 2020-2021, the City may provide a 5-day notice of the proposed amendment to the City's Consolidated/Action Plans and virtual public hearings beginning April 10, 2020 as allowed under HUD waivers.